

L-00000F-09-0190-00144



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ORIGINAL

ARIZONA CORPORATION COMMISSION

UTILITY COMPLAINT FORM RECEIVED

Investigator: Richard Martinez

Phone: [REDACTED]

SEP 18

Fax: [REDACTED]

Priority: Respond Within Five Days

AZ CORP COMMISSION
DOCKET CONTROL

Opinion No. 2009 81768

Date: 9/14/2009

Complaint Description: 19L misc line siting
N/A Not Applicable

Complaint By: **First:** Sherry L. **Last:** Sass

Account Name: President, FOSCR

Home: (000) 000-0000

Street: email address

Work:

City: Tucson

CBR: [REDACTED]

State: AZ **Zip:** 85701

is: E-Mail

Utility Company: Unisource ** Energy Services (UNS)

Division: Electric

Contact Name: [REDACTED]

Contact Phone: [REDACTED]

Nature of Complaint:

(Docket No. L-00000F-09-0190-00144)

From: Sherry Sass [REDACTED]
Sent: Friday, September 11, 2009 4:52 PM
To: Utilities Div - Mailbox
Subject: Sept. 15 Tucson meeting re UNS Electric Vail to Valencia transmission line upgrade and realignment----
Case #144

To the Arizona Corporation Commission (Docket Control?),

Attached please find a copy of a letter and the first three supporting documents that go with it, addressing the concerns of Friends of the Santa Cruz River re the "preferred alternative" route that recently received a "Certificate of Environmental Compatibility" from the ACC's Line Siting Committee.

Thank you for distributing these items to the appropriate parties. I will also bring hard copies to the open meeting on Sept. 15, but was not sure how many copies would be required.
Sincerely,

Sherry L. Sass
President, FOSCR

ATTACHEMENT #1

Friends of the Santa Cruz River [REDACTED]

Arizona Corporation Commission

Arizona Corporation Commission

DOCKETED

SEP 20 2009



ARIZONA CORPORATION COMMISSION

UTILITY COMPLAINT FORM

400 West Congress #222
Tucson, AZ 85701

RE: Case #144 Docket # L-00000F-09-0190-00144
September 5, 2009

To the Commission:

This letter is a further comment and clarification from Friends of the Santa Cruz River (FOSCR), in addition to the public comments that we made at the Line Siting Committee hearings in Rio Rico in June, about the proposed realignment of the electric transmission lines in Rio Rico in "segment 2", specifically the part of the route from just south of the Palo Parado river crossing to the Cañez substation to the south (about 1.3 miles).

There has been much discussion about the mesquite bosques (dense forests dominated by velvet mesquite) that run along the riparian zone of the Santa Cruz River in this area. Based on investigating habitat conditions at the various alternatives on the ground and conferring with wildlife researchers who have extensively studied this area, including Conservation Biologist Scott Wilbor of the Tucson Audubon Society, below are the main points we'd like to make:

1. The mesquite bosque is an increasingly rare component of the Santa Cruz River ecosystem, and since it usually exists only at the less dynamic edges of the "100-year floodplain", it is the habitat type most liable to be cleared for agriculture, building, and other human purposes (see attachment 4).
 - a. According to Santa Cruz County's riparian vegetation report ([www.co.santa-cruz.az.us/com_development/agendafiles/Final Veg Map Report - November 2008.pdf](http://www.co.santa-cruz.az.us/com_development/agendafiles/Final_Veg_Map_Report_-_November_2008.pdf)), only 2/10 of 1% of the county's acreage contains this plant community along the river.
2. Mature bosque, which includes multiple tree species, shrubs, vines, and a complex vertical structure, is an even rarer plant community, but it provides enormous benefits to wildlife that single-species (usually more recently established) mesquite bosques, woodlands or recovering agricultural fields do not.
 - a. Again referring to the Santa Cruz County report, the "mesquite/elderberry/hackberry" forest association, which usually corresponds to mature bosque, covered less than 1/100 of 1% of Santa Cruz County along the river.
3. Mature bosque habitat is significantly threatened by the transmission line realignment "preferred alternative" route that has received a "certificate of environmental compatibility" by the Line Siting Committee (see outlines of "mature bosque" superimposed on county riparian vegetation maps, attachments 1-3)
4. The areas near the east side of the railroad tracks in "segment 2" benefit from higher soil moisture levels than land further east due to lower elevation, and also due to the "levee" effect of the railroad track which tends to back up the flow of groundwater running east to west towards the Santa Cruz River (see attachments 1-3)
5. The existing habitat value of Intervener Marshall Magruder's proposed west-of-the-railroad-tracks exception (9/8/09) is decidedly less than that of the "preferred alternative" route, and therefore is a better option than the "preferred alternative". However, it does involve some additional fragmentation of mature bosque in its current configuration, especially in the northern portion where it would cross mature bosque habitat.
6. If a final route choice is to be made based on doing the least ecological harm, and particularly to minimize damage to mature bosque habitat (which FOSCR strongly urges), then the best option currently under consideration might be to use the current transmission line route, at least between Palo Parado crossing and the Cañez substation, for both the upgraded transmission lines and distribution lines.

ARIZONA CORPORATION COMMISSION

UTILITY COMPLAINT FORM

The bosque habitat along the current distribution line (near the east side of the railroad tracks), although somewhat disturbed, is in far better condition than that in the vicinity of the current transmission lines (in fact much of the current transmission line route has been fairly recently clear-cut to 100' in segment 2). Furthermore, the distribution line-area habitat has a much better likelihood of recovering the structural complexity that has been compromised, because of the reasons described in point #4 above.

Depending in large part on its precise location, this realignment could help protect or further fragment our mature mesquite bosques. Because we are fortunate to maintain one of the few vital river systems remaining in southern Arizona, indeed in the Southwestern U.S., our riparian resources and the wildlife they support are particularly valuable to Santa Cruz County, but also to the entire region.

Thank you for the opportunity to participate in this public process, and in the final decision for the transmission route realignment.

Sincerely,

Sherry L. Sass
President, FOSCR

ATTACHMENT 2

ACC received three copies of maps displaying the affected area in Rio Rico, AZ.

I attached the hard copies to this Opinion as the Tucson scanner does not read anything other than standard print.

End of Complaint

Utilities' Response:

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End of Response

Investigator's Comments and Disposition:

I emailed this OPINION to Trish Meeter @ ACC Phoenix Office to have this docketed towards Unisource ** Energy Services (UNS) - (Docket No. L-00000F-09-0190-00144) FILE CLOSED.

End of Comments

Date Completed: 9/15/2009

Opinion No. 2009 - 81768



Parcels

Road

1.025 Polygon ID

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Miles

